

EXHIBIT "A"

**Proposed Order Granting Relief
from the Automatic Stay**

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a General Motors Corp., *et al.*

CHAPTER 11
CASE NO. 09-50026 (REG)
(Jointly Administered)

Debtors.

ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY

TO: THE HONORABLE ROBERT E. GERBER,
UNITED STATES BANKRUPTCY JUDGE

Upon the Motion of The Schaefer Group Inc., ("*Schaefer*") for entry of an Order granting relief from the automatic stay pursuant to 11 U.S.C. §362 (the "*Code*"), Rules 4001, 4004 and 9014 of the Federal Rules of Bankruptcy Procedure (the "*Bankruptcy Rules*") and applicable Local Bankruptcy Rules for an order modifying the automatic stay to allow the Litigation (as outlined in the Motion) against Motors Liquidation Company, f/k/a General Motors Corp. (the "*Debtor*"), as a third party defendant, to continue and to permit the completion of discovery of all claims, defenses, cross-claims and third-party claims, up to the point of filing a judgment against the Debtor; and notice of the Motion having been given to all parties required to receive such notice, and no other or further notice being required and sufficient cause appearing therefore; it is hereby

ORDERED that the automatic stay under §362 of the Bankruptcy Code is modified and lifted to allow the Litigation entitled Jan E. Hondusky v. Schaefer Furnaces, Inc. et al. v. General Motors Corporation proceeding in Supreme Court, State of New York, County of St. Lawrence, Index Number CA2008-0128254, against Motors Liquidation Company, f/k/a General Motors Corp. as a third party

defendant, to continue; and to permit the completion of discovery of all claims, defenses, cross-claims and third-party claims; and it is further

ORDERED that no judgment shall be filed against the Debtor.

September ____, 2009

United States Bankruptcy Judge

HISCOCK & BARCLAY, LLP